

MARK E. FERRARIO, ESQ.
Nevada Bar No. 1625
KARA B. HENDRICKS, ESQ.
Nevada Bar No. 7743
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Tel: (702) 792-3773
Fax: (702) 792-9002
Email: ferrariom@gtlaw.com
hendricksk@gtlaw.com

DEBO P. ADEGBILE, ESQ.
(Admitted Pro Hac Vice)
CHRISTOPHER SCOTT MCABEE, ESQ.
(Admitted Pro Hac Vice)
ALAN E. SCHOENFELD, ESQ.
(Admitted Pro Hac Vice)
WILMER CUTLER PICKERING HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Tel: (212) 295-6717
Fax: (212) 230-8888
Email: debo.adegbile@wilmerhale.com
Scott.McAbee@wilmerhale.com

*Attorneys for Defendants Democracy Prep Public Schools,
Democracy Prep Public Schools, Inc., Democracy Prep at
the Agassi Campus, Democracy Prep Nevada LLC, School
Board of Democracy Prep at the Agassi Campus, Natasha
Trivers, Adam Johnson, Kathryn Bass, Joseph Morgan,
PhD, and Kimberly Wall*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GABRIELLE CLARK, individually and as parent
and guardian of WILLIAM CLARK, and
WILLIAM CLARK, individually,

Plaintiffs,

vs.

STATE PUBLIC CHARTER SCHOOL
AUTHORITY, DEMOCRACY PREP PUBLIC
SCHOOLS, DEMOCRACY PREP PUBLIC
SCHOOLS, INC., DEMOCRACY PREP at the
AGASSI CAMPUS, DEMOCRACY PREP
NEVADA LLC, SCHOOL BOARD of Democracy
Prep at the Agassi Campus, NATASHA TRIVERS,

CASE NO.: 2:20-cv-02324-APG-VCF

**STIPULATION TO SCHEDULE
AMENDMENT AND ANSWER**

individually and in her official capacity as Superintendent and CEO, ADAM JOHNSON, individually and in his official capacity as Executive Director and Principal, KATHRYN BASS, individually and in her capacity as Teacher, JOSEPH MORGAN, individually and in his official capacity as Board Chair, KIMBERLY WALL, individually and in her capacity as assistant superintendent, and John & Jane Does 1-20,

Defendants.

Plaintiffs Gabrielle Clark and William Clark, by and through their counsel of record, MARQUIS AURBACH COFFING, and Defendants Democracy Prep Public Schools, Democracy Prep Public Schools, Inc., Democracy Prep at the Agassi Campus, Democracy Prep Nevada LLC, School Board of Democracy Prep at the Agassi Campus, Natasha Trivers, Adam Johnson, Kathryn Bass, Joseph Morgan, PhD, and Kimberly Wall (the “Democracy Prep Defendants”), by and through their counsel, GREENBERG TRAURIG, LLP, and WILMER CUTLER PICKERING HALE AND DORR LLP, hereby request that the Court enter the following stipulation and schedule.

1. On April 9, 2021, the parties stipulated that the motion for preliminary injunction be withdrawn. On April 12, 2021, the Court agreed and vacated the preliminary injunction hearing. [ECF No. 99]

2. Defendants consent to Plaintiffs amending their complaint, and the parties agree to the following schedule:

- a. Plaintiffs will file an amended complaint, if any, by **May 3, 2021**.
- b. Defendants will file an answer or motion to dismiss by **June 3, 2021**.
- c. Plaintiffs will file a response, if any, by **July 2, 2021**.

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d. Defendants will file a reply, if any, by **July 30, 2021**.

IT IS SO STIPULATED.

DATED this 14th day of April, 2021.

GREENBERG TRAURIG, LLP

MARQUIS AURBACH COFFING

/s/Kara B. Hendricks

/s/Brian R. Hardy

MARK E. FERRARIO, ESQ.

BRIAN R. HARDY, ESQ.

Nevada Bar No. 1625

Nevada Bar No. 10068

KARA B. HENDRICKS, ESQ.

SUSAN E. GILLESPIE, ESQ.

Nevada Bar No. 7743

Nevada Bar No. 15227

10845 Griffith Peak Drive, Suite 600

10001 Park Run Drive

Las Vegas, Nevada 89135

Las Vegas, Nevada 89145

Attorneys for Plaintiffs

DEBO P. ADEGBILE, ESQ.

(Admitted Pro Hac Vice)

CHRISTOPHER SCOTT MCABEE, ESQ.

(Admitted Pro Hac Vice)

ALAN E. SCHOENFELD, ESQ.

(Admitted Pro Hac Vice)

**STATE PUBLIC CHARTER SCHOOL
AUTHORITY**

WILMER CUTLER PICKERING HALE

/s/Ryan W. Herrick

AND DORR LLP

RYAN W. HERRICK, ESQ.

7 World Trade Center

Nevada Bar No. 7380

250 Greenwich Street

1749 North Stewart St Ste 40

New York, New York 10007

Carson City, Nevada 89706

*Attorneys for Defendants Democracy Prep Public
Schools, Democracy Prep Public Schools, Inc.,
Democracy Prep at the Agassi Campus,
Democracy Prep Nevada LLC, School Board of
Democracy Prep at the Agassi Campus, Natasha
Trivers, Adam Johnson, Kathryn Bass, Joseph
Morgan, PhD, and Kimberly Wall*

*Attorney for State Public Charter School
Authority*

ORDER

In consideration of the stipulation by the parties, and with cause appearing,

IT IS HEREBY ORDERED that Plaintiffs will file an amended complaint, if any, by May 3, 2021. Defendants will file an answer or motion to dismiss by June 3, 2021. Plaintiffs will file a response, if any, by July 2, 2021. Defendants will file a reply, if any, by July 30, 2021.

IT IS SO ORDERED.

DATED this 15th day of April, 2021.


UNITED STATES MAGISTRATE JUDGE